

1 NICOLA T. HANNA
2 United States Attorney
3 LAWRENCE S. MIDDLETON
4 Assistant United States Attorney
5 Chief, Criminal Division
6 STEVEN R. WELK
7 Assistant United States Attorney
8 Chief, Asset Forfeiture Section
9 JOHN J. KUCERA (Cal. Bar 274184)
10 Assistant United States Attorney
11 Asset Forfeiture Section
12 1400 United States Courthouse
13 312 North Spring Street
14 Los Angeles, California 90012
15 Telephone: (213) 894-3391
16 Facsimile: (213) 894-0142
17 E-mail: John.Kucera@usdoj.gov

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT

21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 WESTERN DIVISON

23 UNITED STATES OF AMERICA,

24 No. CV 18-8566-AB

25 Plaintiff,

26 v.

27 **NOTICE OF ERRATA TO THE
REAL PROPERTY LOCATED IN MARICOPA
COUNTY, ARIZONA (PV 1)**

28 \$5,462,027.17 IN BANK FUNDS
SEIZED FROM COMPASS BANK
ACCOUNT '3873; AND
\$407,686.14 IN BANK FUNDS
SEIZED FROM COMPASS BANK
ACCOUNT '4862,

29 Defendants.

30 PLEASE TAKE NOTICE of the following errata in the civil
31 forfeiture complaint filed October 5, 2018 (Dkt. No. X):

32 1. Under the Heading ASSETS HELD BY OR FOR THE BENEFIT OF
33 MICHAEL LACEY, paragraph "4.r." was misplaced. That paragraph
34 should have been included in the section headed, "ASSETS HELD BY OR

1 FOR THE BENEFIT OF JAMES LARKIN," which section presently begins at
2 paragraph "4.t.";

3 2. Under the section headed, "MICHAEL LACEY ASSETS," which
4 section presently begins at paragraph 53, sub-paragraph "M" was
5 misplaced. That sub-paragraph should have been included in the
6 section headed, "JAMES LARKIN ASSETS," which section presently
7 begins at paragraph 77; and

8 3. The section headed, "JAMES LARKIN ASSETS," present
9 paragraph 77 contains inaccurate information. Paragraph 74
10 presently reads,

11 Approximately \$11,480,000 million in illicit funds from
12 Backpage's U.S. Bank account '1165 passed-through various
13 Backpage or Backpage Operators accounts, eventually (between
14 March 15 and September 18, 2014) ending up in BMO Harris
15 account '5263, owned or controlled by Lacey. Thereafter, on
16 March 30, 2015, BMO Harris Bank account '5263 transferred
17 \$774,379.46 towards the purchase of the Paradise Valley
18 Property 1.

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1 Instead, paragraph 74 should read,

2 Approximately \$41.5 million in illicit funds from
3 Backpage's U.S. Bank account '1165 passed through various
4 Backpage or Backpage Operators accounts. Following these
various transfers, eventually, on October 2, 2013, a total
of approximately \$26,130.64 was transferred into BMO
5 Harris account '3110, owned or controlled by Larkin.
Thereafter, on December 11, 2014, BMO Harris Bank account
6 '3100 paid \$46,957.28 to maintain the Paradise Valley
property 1.

7 Dated: October 9, 2018

Respectfully submitted,

9 NICOLA T. HANNA
United States Attorney
10 LAWRENCE S. MIDDLETON
Assistant United States Attorney
11 Chief, Criminal Division
STEVEN R. WELK
12 Assistant United States
Chief, Asset Forfeiture Section

13
14 /s/John J. Kucera
JOHN J. KUCERA
15 Assistant United States Attorney

16 Attorneys for Plaintiff
UNITED STATES OF AMERICA